

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

DAVID SOLOMON,
Plaintiff,

v.

AMAZON.COM, INC.,
WHOLE FOODS MARKET, INC.,
JAY WARREN,
JANE DOE,
Defendants

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Case No: 18-5528 (ERK) (PK)

AUGUST 23, 2019

AMENDED JOINT STATUS REPORT

The undersigned has conferred with counsel for the defendants and submits the following status report with the consent of counsel.

The undersigned informed counsel of his intent to file a request for permission to file a Second Amended Complaint.

Counsel for the defendants objects to the filing of a Second Amended Complaint and has informed counsel of her intent to evaluate, and potentially pursue, sanctions.

The parties request a scheduling order as follows:

1. The undersigned will serve on the defendants a copy of his Motion for Permission to File a Second Amended Complaint together with a copy of the Second Amended Complaint on this date. The items will not be filed in accordance with the chamber practices of Korman, J., until fully briefed, unless otherwise directed to do so by order of the Court.
2. The defendants shall have until August 30, 2019, to place plaintiff's counsel on notice of any potential claims the defendants believe are sanctionable.

3. The defendants shall have until September 27, 2019 to file any objections to the Motion for Permission to File an Amended Complaint, to move to dismiss the complaint, and any claims for sanctions.
4. The plaintiff shall have 20 days after receipt of the defendants' opposition papers to file his reply.
5. The defendants shall 20 days thereafter to file any reply.

Counsel for the parties respectfully request that the Court adopt this schedule as an Order of the Court.

BY: /s/Norman A. Pattis /s/
Norman A. Pattis, No. NP7995
Pattis & Smith, LLC
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CERTIFICATION

This is to certify that on August 23, 2019, a copy of the foregoing was filed electronically. Notice of this filing will be sent, via e-mail, to all parties by operation of the Court's electronic filing system, and the undersigned did cause to be sent, via First Class U.S. mail, postage prepaid, a copy of the foregoing to all counsel and pro se parties that do not have access to the Court's electronic filing system and to whom the court directs the undersigned to send a hard copy via mail. Parties may access this filing through the Court's system.

By: /s/ Norman A. Pattis